

REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

Claims 1-8 have been canceled in favor of new claims 9-14. Support for the subject matter of the new claims is provided at least in the original claims, Figs. 4-6, and the specification on page 11, lines 4-16. The claims have been drafted to avoid the issues underlying the 35 USC 112, second paragraph, rejections applied to claims 2, 3, 6, and 7.

Claims 1 and 5 were rejected, under 35 USC §102(b), as being anticipated by Venkitaraman (US 2003/0185196). Claims 2, 3, 6, and 7 were rejected, under 35 USC §103(a), as being unpatentable over Venkitaraman. Claims 4 and 8 were rejected, under 35 USC §103(a), as being unpatentable over Venkitaraman in view of Chubbs III (US 6,400,304). To the extent these rejections may be deemed applicable to new claims 9-14, the Applicant respectfully traverses.

Claim 9 defines a system that associates a care-of address, for a communication terminal, with multiple access routers that are in close geographic proximity with one another. And some of the access routers are associated with different mobility anchor points. Thus, as the communication terminal moves from a region served by one mobility anchor point to a region served by another, the same care-of address associated with an access router in the first region is used to identify an access router for communicating with the communication terminal in the region served by the other mobility anchor point. Because the same care-of address may be used by separate mobility anchor points, the claimed subject matter supports a more efficient

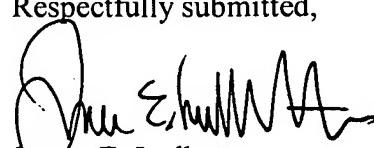
communication transition as the communication terminal moves between regions of different mobility anchor points.

Venkitaraman and Chubbs do not disclose or suggest a care-of address that is effective in communication cells on both sides of boundary separating two mobility anchor points. Although Venkitaraman discloses informing a home agent of a new care-of address when a mobile node moves to a new location (see Venkitaraman paragraph 20), Venkitaraman fails to disclose that the new care-of address is the same one that is effective in cells on the other side of a boundary separating two mobility anchor points. And Chubbs is not cited for supplementing the teachings of Venkitaraman in this regard.

Accordingly, the Applicant submits that Venkitaraman and Chubbs, considered individually or in combination, do not anticipate or render obvious the subject matter defined by claim 9. Independent claim 12 similarly recites the above-mentioned feature distinguishing apparatus claim 9 from the applied references, but with respect to a method. Therefore, allowance of claims 9 and 12 and all claims dependent therefrom is warranted.

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

Respectfully submitted,



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